

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

CATHERINE OKORO,

Plaintiff,

Civil Action No.: 2:11-CV-00267

v.

PYRAMID 4 AEGIS and
JEROME BATTLES,

Defendant.

NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

To: All Defendants
c/o Robert N. Meyeroff
633 West Wisconsin Avenue, Ste. 605
Milwaukee, WI 53203-1925

PLEASE TAKE NOTICE that Plaintiff, Catherine Okoro, shall bring a Motion for Summary Judgment seeking judgment against the Defendant and to dismiss Defendant's counterclaim as a matter of law. Ms. Okoro moves for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rules 7.1 and 56.2 of the United States District Court for the Eastern District of Wisconsin. Any hearing on this motion shall be held at a date and time to be set by the Court.

Discovery in this matter has identified undisputed facts that entitle Ms. Okoro to judgment as a matter of law. It is undisputed that Ms. Okoro performed work on behalf of Pyramid 4 Aegis. It is further undisputed that Ms. Okoro was never paid for her work.

Finally, it is undisputed that Defendant has no evidence to support its counter claim against Ms. Okoro.

This Motion is based upon Plaintiff's Proposed Findings of Fact, Plaintiff's Brief in Support of its Motion for Summary Judgment, the Affidavit of Rebecca L. Salawdeh, the Affidavit of Catherine Okoro, the Affidavit of Tylisa Robinson and the Affidavit of Jonlisa Covington.

Dated this 17th day of February, 2012.

RESPECTFULLY SUBMITTED:

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